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From: Jacob Odekirk
To: Meyer, Dan
Cc: lhiggins@cdatribe-nsn.gov; Bray, Dave; Hardesty, Doug; Thomas Mosher; Steve Henson; Kyle Heitkamp
Subject: RE: Pre-draft revisions to LK-6 construction permits
Date: Friday, July 31, 2020 2:47:52 PM
Attachments: POT220291 Test Report FINAL.pdf

Dan,

After a review of the documents, we do have one comment and a version of proposed language below. This comment is similar to the moisture content discussion we had (i.e., the beginning of kiln schedule may result in "false positive" deviations that aren't representative of emissions).

Comment:
Revise permit condition language for high-temperature alarm deviation and corrective action (PSD Permit Condition 3.5 and mNSR Permit Condition 3.4). The proposed revision is to account for time at the beginning of the drying schedule where zones in the kiln may have actual temperatures higher than the initial drying schedule set points, but it does not indicate the kilns is malfunctioning or over-drying lumber. PotlatchDeltic requests the temperature differential-related permit conditions reflect the maximum temperature set point of the drying schedule.

Proposed Language:
The permittee shall take corrective action to return the actual temperature to the set point temperature if the instantaneous dry bulb temperature of heated air that exits any load of lumber in any zone of the kiln as measured pursuant to Condition 4.1.5.2 exceeds the maximum set point temperature in the drying schedule by more than 20°F. The entire duration of each exceedance of the 20°F temperature differential threshold shall be considered one permit deviation.

In regards to the baghouse source tests, they were submitted via email on our behalf by Bison Engineering on April 28, 2020, with a subsequent hard-copy of the reports mailed to EPA R10 as well. An electronic copy is also attached for convenience.

Feel free to contact me with any questions, comments, or concerns.

Jacob Odekirk
Environmental Manager | PotlatchDeltic
O: (208) 245-7503 | C: (208) 568-1009

From: Meyer, Dan <Meyer.Dan@epa.gov>
Sent: Thursday, July 16, 2020 5:19 PM
To: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Steve Henson <Steve.Henson@PotlatchDeltic.com>; Kyle Heitkamp <kheitkamp@ramboll.com>
Cc: lhiggins@cdatribe-nsn.gov; Bray, Dave <Bray.Dave@epa.gov>; Hardesty, Doug <Hardesty.Doug@epa.gov>
Subject: Pre-draft revisions to LK-6 construction permits

[External Email] – Exercise caution with links and attachments.

Jacob,

In response to your application to revise the LK-6 construction permits, EPA Region 10 has prepared pre-draft minor NSR and PSD permits for your review along with accompanying support documents. The documents are attached. Please review the attached material for technical accuracy and representativeness, and share your comments with us by July 31. If you'd like to meet and discuss the documents, I'm available to join you on a call and answer any questions you may have. Note that I'll be unavailable July 27 through 30, but Doug Hardesty will be around in my absence.

Dan Meyer
206.553.4150
Air Permit Writer
Air Permits and Toxics Branch, Air and Radiation Division, U.S. EPA Region 10
1200 Sixth Avenue, Suite 155, Mailcode 15-H13
Seattle, WA 98101-3188